

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	: Master File No. 1:09-CV-7822
IN RE PFIZER INC. SHAREHOLDER	: (JSR)
DERIVATIVE LITIGATION	:
	: NOTICE OF MOTION FOR
	: SUMMARY JUDGMENT
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PLEASE TAKE NOTICE that upon the annexed Declaration of James P. Rouhandeh, sworn to on October 22, 2010, with exhibits annexed, upon the complaint in the above-entitled action, and upon all other papers and proceedings heretofore had herein, defendants Dennis A. Ausiello, Michael S. Brown, M. Anthony Burns, Robert N. Burt, W. Don Cornwell, William H. Gray III, Constance J. Horner, James M. Kilts, Jeffrey B. Kindler, George A. Lorch, Suzanne Nora Johnson, Dana G. Mead, William C. Steere, Jr., Henry A. McKinnell, Joseph M. Feczko, Douglas M. Lankler and Ian Read (collectively, "individual defendants") will move this Court, Honorable Jed S. Rakoff, U.S.D.J., for an order granting summary judgment for defendants pursuant to Rule 56 of the Federal Rules of Civil Procedure, and for such other and further relief as may be just and proper. The grounds for this motion are set forth in the Memorandum of Law in Support of the Individual Defendants' Motion for Summary Judgment, Individual Defendants' Statement of Undisputed Material Facts Pursuant to Local Rule 56.1, the Declaration of James P. Rouhandeh in Support of the Individual Defendants' Motion for Summary Judgment, and the accompanying exhibits.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's August 9, 2010 Civil Case Management Plan, papers in opposition to this motion must be served on

or before November 12, 2010, and reply papers in support of this motion must be served on or before November 22, 2010.

Dated: New York, New York
October 22, 2010

DAVIS POLK & WARDWELL LLP

By: /s/ James P. Rouhandeh
Robert B. Fiske, Jr. (robert.fiske@davispolk.com)
James P. Rouhandeh (rouhandeh@davispolk.com)
Ross B. Galin (ross.galin@davispolk.com)
450 Lexington Avenue
New York, New York 10017
Telephone: (212) 450-4835
Facsimile: (212) 450-5158

*Attorneys for defendants Joseph M. Feczko,
Douglas M. Lankler, and Ian Read.*

CADWALADER, WICKERSHAM & TAFT LLP

By: /s/ Hal S. Shaftel
Dennis J. Block (dennis.block@cwt.com)
Hal S. Shaftel (hal.shaftel@cwt.com)
One World Financial Center
New York, New York 10281
Telephone: (212) 504-6680
Facsimile: (212) 504-6666

*Attorneys for defendants Dennis A. Ausiello,
Michael S. Brown, M. Anthony Burns, Robert N.
Burt, W. Don Cornwell, William H. Gray III,
Constance J. Horner, James M. Kilts, Jeffrey B.
Kindler, George A. Lorch, Suzanne Nora Johnson,
Dana G. Mead, William C. Steere, Jr., and Henry A.
McKinnell.*